



NATIONAL ASSOCIATION OF REGISTERED SOCIAL SECURITY ANALYSTS

Jennifer Piorko Mitchell
Office of the Corporate Secretary
Financial Industry Regulatory Authority- FINRA®
1735 K Street, NW Washington, DC 20006-1506

Dear Ms. Mitchell:

As the Program Director of the National Association of Registered Social Security Analysts Ltd. (NARSSA.ORG), we appreciate the opportunity to comment on continuing education enhancements under consideration by the Securities Industry/Regulatory Council on Continuing Education.

Comments are specifically limited to changes under consideration related to Firm Element.

The Firm Element education requirement is currently unstructured and varies from firm to firm. In-house training and attendance at seminars and events cannot ensure delivery of an adequate level of training nor provide a measurement that certain knowledge has been obtained by the attendee.

We believe Firm Element education should be limited to online delivery. Any seminars, in-house training or education should be supportive in nature only to an online delivery method of course and subject matter testing.

NARSSA.ORG provides investment advisers, representatives and financial professionals with an online educational platform dedicated to Social Security and Medicare education and training. We believe effective education will help ensure that the financial needs of a growing senior population are being met by brokers, investment advisers and others in the financial services industry. Our online platform provides advisers with a five-course online curriculum which is a prerequisite for taking our online proctored exam to obtain the certificate credential as a Registered Social Security Analyst®. As a third-party training provider, these courses include randomized questions to prevent sharing of answers and are currently approved for CE by NASBA for the CPA profession, by the CFP Board for Certified Financial Planners and by the Internal Revenue Service for Enrolled Agents and other tax professionals that have continuing education requirements.

We believe that the CE Council should consider the approach taken by the CPA profession in which NASBA established quality assurance standards for delivery of continuing education. The Statement on Standards of Continuing Professional Education were developed by NASBA and the AICPA to promote consistent quality in CPE (CE) courses for the profession. A national registry of third-party providers of CPE was then established. These third-parties apply to NASBA for approval of their course content and delivery methods and adhere to standards established by the Board.

We support the CE Council in considering the creation of a centralized content catalog to serve as an additional source of Firm Element content, working together with third-party online training providers to offer a large catalog of readily available materials that are centrally located for convenience, that adhere to the standards of online education set by the CE Council. FINRA® should define minimum standards for Firm Element.

Michael Rosedale CPA
Program Director